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BY ECF

Honorable Judge Kimba M. Wood
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Publicis Media Limited, et al v. Moxie Software, Inc.
Civil Action No. 18-cv-10385-KMW

Dear Judge Wood:

We represent Defendant Moxie Software, Inc. in the above referenced matter. We write to request a stay of proceedings while the parties conduct settlement discussions, including through private mediation. Plaintiffs consent to this request.

By way of brief background, this is a trademark case. Plaintiffs filed the complaint on November 8, 2018. On November 5, 2019, Defendant filed a motion to dismiss the complaint. On December 3, 2019, Plaintiffs filed an amended complaint.

Before incurring additional expense on more motion practice and potential discovery, the parties wish to further explore the possibility of settlement. The parties are discussing scheduling a series of executive-level phone calls in January 2020, to be followed in February or March by private mediation, provided the executive-level discussions are productive. We respectfully request a stay of proceedings during this time so the parties may focus on these discussions. The parties propose that they provide a status update to the Court on January 31, 2020.

Granted.
KMW

The Court has not set an initial conference, and thus this stay will not affect any Court scheduled date. We thank the Court for its consideration and courtesies.

Respectfully submitted,

/s/ Jared I. Kagan

Jared I. Kagan

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12-17-19
SO ORDERED, N.Y., N.Y.
Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.